

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CHRISTINE J. FORGUES)	Case NO. 1:15-cv-1670
)	
Plaintiff,)	
v.)	JUDGE JAMES GWIN
)	
SELECT PORTFOLIO SERVICES, INC.)	MAGISTRATE JUDGE MCHARGH
)	
)	<u>MOTION TO RESCHEDULE</u>
Defendant(s))	<u>HEARING</u>

Plaintiff, CHRISTINE J. FORGUES, by and through the undersigned counsel, hereby moves this Honorable Court for entry of an Order rescheduling the status conference currently set for February 17, 2016.

1. The undersigned, who is a solo practitioner, is currently scheduled to appear before the Eighteenth Judicial Circuit in and for Brevard County, Florida on a separate pending matter, squarely during the date and time this Court is scheduled to hear this matter.

2. Likewise, Plaintiff, CHRISTINE J. FORGUES, has a pre-scheduled appointment she must attend at the same date and time this matter is scheduled to be heard.

3. Plaintiff is unable to appear telephonically, as she has a work obligation which mandates her presence, and not complying with said obligation would be detrimental to her employment.

4. Given the scheduling conflicts presented by both the Plaintiff and the undersigned, good cause exists to postpone the February 17, 2016 status conference, and reschedule same to be heard on a date and time when both the Plaintiff and undersigned can appear and address the pending issues before this Honorable Court in the case at bar.

5. The undersigned and Plaintiff are available on Feb 26, 2016; Feb 29, 2016; or March 4, 2016.

6. The foregoing motion is made in good faith and not for the purpose of delay.

7. Neither party will be prejudiced by the relief sought herein.

8. Undersigned counsel has made a good-faith effort to confer with Defense Counsel prior to the filing of this motion, but has been unable to do so. Notwithstanding, undersigned counsel will make every effort to confer with and resolve this matter with Defense Counsel.

WHEREFORE, Plaintiff, CHRISTINE J. FORGUES, respectfully moves this Honorable Court to GRANT the foregoing motion, and reschedule the Status Conference for the reasons set forth herein, and for such other relief this Honorable Court deems just and proper.

Respectfully submitted by,

By: /s/ JOHN HERRERA

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CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of February, 2016, a copy of the foregoing **MOTION TO RESCHEDULE** was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

By: /s/ JOHN HERRERA

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